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*Attorneys for Defendant Solana Labs, Inc.*

*Additional Counsel on Signature Page*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MARK YOUNG, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

SOLANA LABS, INC., MULTICOIN  
CAPITAL MANAGEMENT LLC, and KYLE  
SAMANI,

Defendants.

Case No.: 3:22-cv-03912-RFL

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING DEFENDANTS'  
TIME TO FILE REPLIES IN SUPPORT OF  
MOTIONS TO DISMISS CONSOLIDATED  
AMENDED CLASS ACTION COMPLAINT**

(Civil L.R. 6-1, 6-2, 7-12)

Hon: Rita F. Lin

Pursuant to Civil Local Rules 6-1 and 6-2, Lead Plaintiff Mark Young (“Plaintiff”), Defendants Solana Labs, Inc. (“Solana Labs”), Multicoin Capital Management LLC (“Multicoin”) and Kyle Samani (together with Solana Labs and Multicoin, “Defendants,” and collectively with Plaintiff, the “Parties”), by and through their respective counsel, hereby stipulate as follows:

**WHEREAS**, on December 21, 2023, the Court granted the Parties’ stipulation providing that following the filing of Plaintiff’s amended complaint on January 12, 2024, Defendants would move to dismiss on or before March 12, 2024, Plaintiff would oppose on or before April 11, 2024, and Defendants would reply on or before May 13, 2023 (Dkt. 67);

**WHEREAS**, on January 12, 2024, Plaintiff filed his Consolidated Amended Class Action Complaint (“Amended Complaint”) (Dkt. 68);

**WHEREAS**, on February 14, 2024, the Court granted the Parties’ stipulation revising the briefing schedule on Defendants’ motions to dismiss to provide that Defendants would file their anticipated motions to dismiss on or before April 11, 2024, Plaintiff would file his oppositions on or before May 13, 2024, and Defendants would file their replies on or before June 12, 2024 (Dkt. 71);

**WHEREAS**, on April 11, 2024, Defendants filed their motions to dismiss and noticed a hearing on the motions for August 6, 2024 (Dkts. 76, 80);

**WHEREAS**, on May 13, 2024, Plaintiff filed his oppositions to Defendants’ motions to dismiss (Dkts. 87, 88);

**WHEREAS**, Defendants’ replies in support of their motions to dismiss are due June 12, 2024 (Dkt. 71);

**WHEREAS**, in light of the complexity and length of the oppositions, as well as deadlines in other matters and personal obligations for Defendants’ counsel, the Parties met and conferred and agreed that good cause exists for a modest extension to Defendants’ time to file their replies in support of their motions to dismiss from June 12, 2024 to June 20, 2024;

1 IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the  
2 parties, that subject to the Court's approval:

3 1. Defendants shall file their replies in support of their respective motions to dismiss  
4 on or before June 20, 2024.

5  
6 DATED: May 23, 2024

LATHAM & WATKINS LLP

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*Attorneys for Defendant Solana Labs, Inc.*

1  
2 DATED: May 23, 2024

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*Counsel for Plaintiff Mark Young and the  
Proposed Class*

18 DATED: May 23, 2024

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*Attorneys for Defendants Multicoïn Capital  
Management, LLC and Kyle Samani*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2

3 DATED:

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\_\_\_\_\_  
Hon. Rita F. Lin  
United States District Court Judge

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**SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Continuing Defendants' Time to File Replies in Support of Motions to Dismiss Consolidated Amended Class Action Complaint. Pursuant to L.R 5-1(i)(3) regarding signatures, I, Susan E. Engel, attest that concurrence in the filing of this document has been obtained.

DATED: May 23, 2024

/s/Susan E. Engel

Susan E. Engel